

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: DRAFT

Region: Washington Regional Office
County: Chowan
NC Facility ID: 2100080
Inspector's Name: Randall Jones
Date of Last Inspection: 05/24/2016
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Edenton Boatworks, LLC</p> <p>Facility Address: Edenton Boatworks, LLC 140 Midway Drive Edenton, NC 27932</p> <p>SIC: 3732 / Boat Building And Repairing NAICS: 336612 / Boat Building</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 15A NCAC 02Q .0513 NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2100080.16A Date Received: 03/08/2016 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 08995/T07 Existing Permit Issue Date: 06/26/2015 Existing Permit Expiration Date: 02/28/2017</p>
Bobby Lane Health and Environmental Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	Burch Perry Vice President and General Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	Bobby Lane Health and Environmental Manager (252) 482-7423 140 Midway Drive Edenton, NC 27932	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	0.0600	0.0200	2.37	---	0.2500	1.92	1.66 [Styrene]
2014	0.0500	0.0100	2.28	---	0.2600	1.99	1.61 [Styrene]
2013	0.0600	0.1700	1.82	0.0100	0.2200	1.66	1.31 [Styrene]
2012	0.2700	1.20	1.65	0.0400	0.1800	1.57	1.27 [Styrene]
2011	0.4400	1.66	2.01	0.0700	0.2300	2.00	1.55 [Styrene]

<p>Review Engineer: Kevin Godwin</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08995/T08 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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I. Introduction

A. According to the renewal application, Edenton Boatworks, LLC manufactures fiberglass boats. The existing permit covers sources including:

- Assembly operations (ID No. ES-1),
- Liner lamination/gelcoating (ID No. ES-2),
- Deck lamination/gelcoating (ID No. ES-3),
- Hull lamination/gelcoating (ID No. ES-4),
- Secondary production area (ID No. ES-7), and
- No. 2 fuel oil/propane-fired boiler (8.9 million Btu per hour heat input, ID No. ES-5)

Additionally, there are a number of insignificant activities, including:

- Two woodworking spray booths (ID Nos. IES-6 and IEP-11),
- No. 2 fuel oil-fired emergency generator (570 kW, ID No. IES-G1), and
- Tooling room operations (ID Nos. IEP-8 and 9).

B. The application to renew the existing Title V air quality permit was received on March 8, 2016 or within nine months prior to permit expiration, and is currently covered by the application shield provided in 15A NCAC 02Q .0512.

C. The Permittee has not proposed any changes to the existing Title V operating permit as part of the renewal process. The last permit renewal was 08995T06 issued on March 16, 2012. On June 26, 2015, 08995T07 was issued as an ownership/name change.

II. Changes to Existing Title V Air Permit

The following table provides a summary of changes made to existing permit 08995T07

Page No.	Section	Description of Change
Cover letter	N/A	Amended application type; permit revision numbers, dates and included updated letterhead.
1	Permit cover page	Amended permit revision numbers and all dates.
N/A	All, Header	Updated permit revision number. Added 0 to 2D and 2Q regulations.
4	2.1 A.	Removed applicability of 15A NCAC 02D .0958.
Old page No. 7	2.1 A.4.	Removed specific condition pertaining to 15A NCAC 02D .0958.
6	2.1 B.5.	Included a new condition referencing the requirements under 15A NCAC 02D .1111, MACT, Subpart DDDDD.
Global	Global	Replaced the word assure with ensure throughout permit, except General Conditions.
7	3	Updated General Conditions to latest shell version (v4.0).

III. Statement of Compliance

DAQ has reviewed the facility’s compliance status. The facility was last inspected on May 24, 2016 by Mr. Randall Jones of the Washington Regional Office (WARO). According to the inspection report, at the time of inspection the facility appeared to be operating in full compliance with all applicable requirements. Regarding the 5-year compliance history, the report notes that a Notice of Deficiency (NOD) was issued for failure to perform an annual inspection for the 2013 calendar year.

IV. Review of Applicable Regulations

- A. Fiberglass boat manufacturing operation consisting of:
- Assembly Operations (ID No. ES-1),
 - Liner lamination/gelcoating (ID No. ES-2),

- Deck lamination/gelcoating (ID No. ES-3),
- Hull lamination/gelcoating (ID No. ES-4), and
- Secondary production area (ID No. ES-7)

1. Applicable Regulatory Requirements
 - a. 15A NCAC 02D .0515,
 - b. 15A NCAC 02D .0521,
 - c. 15A NCAC 02D 1806,
 - d. 15A NCAC 02D .1100
 - e. 15A NCAC 02Q .0711
 - f. 15A NCAC 02D .1111, MACT Subpart VVVV
2. No new applicable regulations apply to these sources as part of the Title V permit renewal. No other regulatory review is required at this time.

B. No. 2 Fuel Oil and Propane-fired boiler (ID No. ES-5)

1. Applicable Regulatory Requirements
 - a. 15A NCAC 02D .0503
 - b. 15A NCAC 02D .0516
 - c. 15A NCAC 02D .0521
 - d. 15A NCAC 02D .1109, Case-by-Case MACT for Boilers & Process Heaters
2. The boiler is subject to 15A NCAC 02D .1111 MACT, Subpart DDDDD. According to the inspection report, the boiler was manufactured in 1964 and is therefore considered an existing affected source. Work practice standards apply to the boiler. The boiler is required to have a one-time energy assessment and biennial tune-ups. A new condition is placed in the permit referencing the requirements under Subpart DDDDD.

No other regulatory review is required at this time.

V. Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, the provisions of the CAM rule are applicable to emission units that meet all of the following criteria:

1. The unit is subject to an emissions limitation AND uses a control device to achieve compliance with the limit;
2. The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source; and
3. The unit is not exempt under 40 CFR 64.2(b).

Because the facility does not use control devices to achieve compliance with an emissions limit, CAM does not apply.

VI. Maximum Achievable Control Technology (MACT) Applicability

The facility is considered a major source of HAP emissions and is subject to MACT, Subpart VVVV, “National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.” The existing permit includes a condition referencing the facility’s requirements under Subpart VVVV. The condition is carried over to the renewed permit.

As stated above the existing boiler (ID No. ES-5) is subject to 15A NCAC 02D .1111, MACT Subpart DDDDD.

The existing emergency generator (ID No. IES-G1) is subject to 15A NCAC 02D .1111, MACT Subpart ZZZZ. According to the MACT, the facility must provide initial notification and has no other requirements. Compliance is indicated.

VII. Prevention of Significant Deterioration (PSD)

Based on current capacity of 200 boats per year, the facility’s potential emissions will not exceed the major source threshold for any criteria pollutant. With regards to PSD, the facility is classified as a minor stationary source. No limits are necessary.

VIII. New Source Performance Standards (NSPS)

No sources at this facility are subject to NSPS.

IX. State-only Toxic Air Pollutant (TAP) Procedures

The existing permit includes a condition referencing the requirements listed in 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit.” This regulation requires the facility to be operated and maintained in such a manner that TAP emissions do not exceed the toxic permit emission rates (TPER). The existing condition is carried over to the renewed permit. According to the inspection report, compliance is indicated.

The existing permit also includes a condition referencing the requirements of 15A NCAC 02D .1100 “Control of Toxic Air Pollutants.” Recordkeeping and reporting is required. The existing condition is carried over to the renewed permit.

X. Insignificant Activities

The existing permit includes a list of insignificant activities under 15A NCAC 02Q .0503(8). DAQ has confirmed that maximum emissions from these sources are less than 5 tpy of all regulated criteria pollutants and less than 1,000 lb/year HAP. No new applicable regulations apply to these sources as part of the Title V permit renewal. No other regulatory review is required at this time.

XI. Permitting History Since Issuance of Title V Permit Renewal

The Permit has not been modified since the last permit renewal.

XII. Other Regulatory Considerations

- An application fee is not required for this renewal application.
- A zoning consistency determination is not required for this renewal application.
- A Professional Engineer’s Seal is not required for this renewal application.
- DAQ Title V Equipment Editor (TVEE) database update was approved on April 3, 2017.

XIII. Draft/Proposed Permit Review Summary

- Mr. Yongcheng Chen, (WARO) was provided a draft permit for review on April 3, 2017. WARO responded on XXXXX with XXX comments.
- Mr. Bobby Lane (Edenton Boatworks) was provided a draft permit for review on April 3, 2017. Edenton Boatworks responded on XXXX with XXXX comments. All comments were addressed.
- NCDAQ published a Public Notice of the proposed Title V permit renewal on XXXX on DAQ website. The public comment period expired on XXXX with no comments received.
- U.S. EPA Region IV was provided a draft permit for review on XXXX. EPA comment period expired on XXXX with no comments received.

XIV. Recommendations

This Title V Permit Renewal for Edenton Boatworks, LLC, Chowan County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility appears to be complying or is expected to achieve compliance as specified in the permit with all applicable requirements. DAQ recommends issuance of the permit renewal.